

EXHIBIT B

From: [Ong, Andrew](#)
To: [TQDelta Listserv](#); TQD-MHM-TX@mcandrews-ip.com
Cc: [DG-CommScope-TQDelta](#); [Nokia309](#); [Eric Findlay](#); [Brian Craft](#)
Subject: RE: TQD v. CommScope - Election of Asserted Prior Art
Date: Friday, September 2, 2022 3:32:02 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Counsel,

In light of TQ Delta's expert reports, we understand that TQ Delta has dropped the '348, '055, and '988 patents against CommScope. Please let us know if that understanding is incorrect.

CommScope revises its provisional "Final Election of Asserted Prior Art" as follows. CommScope reserves all rights to amend its elections based on the Court's ruling on the pending motion for further narrowing.

Thanks.

Andy

Family 1

- '686 patent
 - FI-071
 - FI-071 + G.992.1

Family 2

- '881 patent
 - Counterman
 - Counterman + Djokovic

Family 3

- '048 patent
 - Mazzoni + G.993.1
 - Mazzoni + LB-031
 - Fadavi-Ardekani + G.993.1
- '882 patent
 - Mazzoni + G.993.1
 - Mazzoni + LB-031
 - Fadavi-Ardekani + G.993.1

Family 4

- '008 patent
 - Jones

- T1.413-1998 + Stopler

-

Family 6

- '835 patent
 - G.992.1
 - G.992.1 + SC-060
 - SC-060
 - G.992.1 + Wunsch

Family 9

- '411 patent
 - G.992.1 + BI-089
- '055 patent
 - BI-089 + Fukushima
- '348 patent
 - BI-089
 - G.993.1 + BI-089
 - G.993.1 + Fukushima
- '809 patent
 - G.993.1 + BI-089
 - G.993.1 + Fukushima

Family 10

- '988 patent
 - Chow
 - TNETD8000 EVM User Guide
 - Peeters
 - Kapoor + Chow
- '354 patent
 - Chow
 - Kapoor + Chow

From: Ong, Andrew

Sent: Monday, August 29, 2022 9:18 PM

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Subject: TQD v. CommScope - Election of Asserted Prior Art

Counsel,

CommScope hereby provides its provisional final election of asserted prior art. To the extent the Court permits Defendants to assert additional prior art grounds in connection with Defendants' further motion to narrow the claims in this case, CommScope elects all grounds of prior art set forth

in the submitted invalidity expert reports.

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 - Chow
 - Kapoor + Chow

Thanks.

Andy

Andrew Ong



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